

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ACE AMERICAN INSURANCE COMPANY, )  
FEDERAL INSURANCE COMPANY, )  
INSURANCE COMPANY OF NORTH AMERICA, )  
MARYLAND CASUALTY COMPANY and ) C.A. NO.  
NORTHERN INSURANCE COMPANY, ) 04CV12252-WGY  
Plaintiffs, )  
v. )  
CROSBY YACHT YARD, INC. and )  
OYSTER HARBORS MARINE, INC., )  
Defendants. )

**RENEWED MOTION FOR CONSOLIDATION OF ACTIONS**  
(Filed in C.A. No. 04-12244-GAO)

Now come the plaintiffs in the above-entitled action, and each of them, by their attorneys, renew their Motion for Consolidation of Actions with Civil Action No. 04-12244-GAO pursuant to the February 24, 2005 Order of the Court in Civil Action No. 04-12252-WGY. The following documents requesting consolidation, filed in the above-captioned matters, are attached herewith in renewal of the plaintiffs motion:

1. Motion for Consolidation of Actions;
2. Affidavit in Support of Motion for Consolidation of Actions;
3. Memorandum in Support of Motion for Consolidation of Actions; and
4. Defendant Crosby Yacht Yard Inc.'s Opposition to Plaintiff's Motion for Consolidation of Actions

Wherefore, the plaintiffs pray that the above-captioned actions be consolidated before Judge O'Toole with Civil Action No. 04-12244-GAO, *Standard Fire Insurance Company v. Crosby Yacht Yard, Inc. and Oyster Harbors Marine, Inc.*

ACE American Insurance Company,  
Federal Insurance Company,  
Insurance Company of North America,  
Maryland Casualty Company and  
Northern Insurance Company  
By their attorney,

/s/ Thomas D. Frothingham  
David J. Daly, Esq. BBO #112840  
Thomas D. Frothingham, Esq. BBO #645838  
Daly Cavanaugh LLP  
27 Mica Lane  
Wellesley, MA 02481  
(781) 237-0600

**Certificate of Service**

I hereby certify that on February 28, 2005, I electronically filed plaintiffs' Renewed Motion for Consolidation of Actions with the four attached documents referred to therein with the Clerk of the Court in CV No. 04-12244-GAO with the CM/ECF system, which will send out notification to the following parties:

1. John H. Bruno, II, Esq.
2. Seth H. Holbrook, Esq.
3. Robert E. Kiely, Esq.

/s/ Thomas D. Frothingham  
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